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February 27, 2017

BY ECF ONLY

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: *United States v. Irfan Amanat*, 15 Cr. 536 (PGG)

Dear Judge Gardephe:

I am writing pursuant to Your Honor's Order of January 20, 2017 setting the schedule for defendants' pretrial motions.

While the Order provides that all defendants' pretrial motions are due on March 31, 2017, because I had just been appointed as counsel for Irfan Amanat (who was only added to the Indictment in December 2016), Your Honor granted me leave to request additional time within 30 days after receiving discovery from the Government. For the reasons explained below, I am writing to request an additional 60 days for Irfan Amanat's pretrial motions to be filed. I propose that his motions be filed on May 26, 2017, that the Government response be filed by June 16, and that Irfan Amanat's reply, if any, be filed by June 30.

Briefly, I received most of the discovery from the Government on January 27, 2017. On January 31, I met with AUSAs Andrea Griswold and Damian Williams as well as Postal Inspector Melissa Atkin. The Government made a second production of discovery on February 18. With the help of Julie de Almeida, Esquire, I have started reviewing, indexing and cataloging the almost two terabytes of documents in these productions.¹

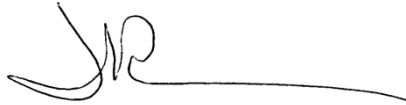
¹ For a frame of reference, I have been told that one terabyte equals approximately 27,000 of the bankers' size boxes that I used to receive from the Government when discovery was all on paper, but I will concede that this may be something of an exaggeration because the discovery produced includes digital formats that consume more space than images of paper documents.

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Given my review to date, it is clear to me that I will not be able to make sufficient progress reviewing the discovery in time to file the pretrial motions that may be necessary by March 31. At my meeting with the Government, the prosecutors answered most of my questions about the charges, thereby obviating the need to request a Bill of Particulars. They also agreed to provide me with some specific information, such as bank and investment account numbers, and to point me in the direction of the documents and categories of documents that they believe are most relevant to the charges against Irfan Amanat, but to date I have not received that information. For all these reasons, I respectfully request additional time to file pretrial motions on behalf of Irfan Amanat.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JRS', followed by a long horizontal line extending to the right.

Jill R. Shellow

cc: All counsel (by ECF)
Irfan Amanat (by email only)